

To: Mark Koontz[Mark.Koontz@ci.bremerton.wa.us]
From: Chris Wion
Sent: Thur 12/31/2009 11:22:55 AM
Subject: RE: Bremerton v. Sesko

Strange, it should have arrived. Let me know if it doesn't show up on Monday. Happy New Year to you too.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Thursday, December 31, 2009 11:20 AM
To: Chris Wion
Cc: Leighann Denton
Subject: RE: Bremerton v. Sesko

FYI - No FedEx delivery today. I will get it filed sometime next week. Happy New Year!

-Mark

Mark E. Koontz
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From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Wednesday, December 30, 2009 2:44 PM
To: Mark Koontz
Cc: Leighann Denton
Subject: RE: Bremerton v. Sesko

Great. They should arrive by then.
-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Wednesday, December 30, 2009 2:43 PM
To: Chris Wion
Cc: Leighann Denton
Subject: RE: Bremerton v. Sesko

Sounds good. I just received word that the judge will be available to sign it before noon tomorrow, so if I get the docs by 10:30 a.m. tomorrow, I'll be able to present them to her tomorrow.

Mark E. Koontz
Assistant City Attorney

BREMERTON-002955

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From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Wednesday, December 30, 2009 2:06 PM
To: Mark Koontz
Subject: RE: Bremerton v. Sesko

Thanks Mark. I will send you a FedEx package with both signed originals, to arrive tomorrow.
-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Wednesday, December 30, 2009 2:00 PM
To: Chris Wion
Cc: Leighann Denton
Subject: RE: Bremerton v. Sesko

Chris,

Stip and Order looks fine. I'd be happy to present that to the judge. I may be able to do that as earlier as tomorrow afternoon (I have an email into court admin to see if Judge Olsen will be there tomorrow). I would be happy to file your NOA too, but I need the original to file. If you FedEx the original to my office for delivery tomorrow morning, I can file it before presenting the Stip and Order to the judge. As for the Stip and Order, you can fax or email a copy of your signature or simply authorize me to sign for you. Let me know.

-Mark

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From: Chris Wion [mailto:chrisw@dhl.com]

BREMERTON-002956

Sent: Wednesday, December 30, 2009 12:49 PM
To: Mark Koontz
Subject: RE: Bremerton v. Sesko

Mark,

For your review, I am attaching a draft Stipulated Motion and [Proposed] Order Amending Order Setting Trial Date and Civil Case Event Schedule - based on the motion you sent on Monday. Please let me know if you have any changes.

Also, please let me know if your office could file both the stipulation and our attached Notice of Appearance - which will need to be filed first. If not, we will need to file via FedEx, which will take some additional time.

Thanks.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Monday, December 28, 2009 10:53 AM
To: Chris Wion
Subject: RE: Bremerton v. Sesko

That's fine. I didn't realize you were going to be appearing for her this week. Feel free to draft a stip and order and email it over to me. I will be in the office all week.

Mark E. Koontz
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From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Monday, December 28, 2009 10:46 AM
To: Mark Koontz
Subject: RE: Bremerton v. Sesko

Mark,

I think there are a few ways to do this, but let me make this suggestion, which should streamline the process. How about we first file our notice of appearance (today or tomorrow) and then we can submit a cursory stipulated motion? Let me know if that works for you. Thanks.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]

Sent: Monday, December 28, 2009 10:39 AM
To: Chris Wion
Subject: RE: Bremerton v. Sesko

Here is a copy of the motion. I haven't had my legal assistant proof it yet, so it may have a few typos.

Mark E. Koontz
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From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Monday, December 28, 2009 10:29 AM
To: Mark Koontz
Subject: RE: Bremerton v. Sesko

Thanks Mark. We will join in the request for a continuance, but I'd like to see the motion before it is filed. I'll be here all day, so turnaround should be quick.

-Chris

-----Original Message-----

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Monday, December 28, 2009 10:26 AM
To: Chris Wion
Subject: RE: Bremerton v. Sesko

Chris,

Thanks for your email. First, the City is not interested in leasing Ms. Sesko's Pennsylvania Way property. I am working on the motion and will have it filed and emailed to you today. I intend to request a new trial date to be set no earlier than November 1, 2010. Please email me whether you join in that request.

-Mark

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From: Chris Wion [mailto:chrisw@dhl.com]
Sent: Monday, December 28, 2009 8:22 AM
To: Mark Koontz
Subject: Bremerton v. Sesko

Mark,

During our last telephone conference, you indicated that you would (a) investigate whether the City would be interested in leasing Mrs. Sesko's Pennsylvania Way property and (b) prepare a draft motion for trial continuance in the pending action. I understand that the holidays create some timing problems, but please let me know when we should expect to hear back from you on these two items.

Thank you.

-Chris

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